From: PETERSON Jenn L
To: Eric Blischke/R10/USEPA/US@EPA
Subject: RE: Data Use Rules
Date: 07/22/2008 08:51 AM

For number 2, doing it media specific will help make the data rules more applicable to the food web and BSAF modeling. My original comment was to clarify if the data rules applied to the modeling efforts and if so to re-evaluate the rules in terms of modeling needs.

-Jennifer

-----Original Message-----
From: Blischke.Eric@epamail.epa.gov
[mailto:Blischke.Eric@epamail.epa.gov]
Sent: Monday, July 21, 2008 4:25 PM
To: PETERSON Jenn L
Subject: RE: Data Use Rules

Regarding number 2, my understanding is that if a chemical was never detected in a given media, that the concentration would be assumed to be zero in all samples for that media. If was detected at least once, then, a concentration of 1/2 the detection limit will be used. Kristine commented that we should use the ProUCL ROS approach since that is what we are doing for the risk assessment. that makes sense to me. Though I do not recall exactly, if we go with the ROS approach the FWM/BSAF approach and the risk assessment approach will be the same. I guess I need more clarification regarding your question.

Regarding number 3, I agree that the presence/absence determination should be media specific. I am less certain about the exposure unit concept. However, I will check in with Keith Pine on this.

Eric

"PETERSON Jenn L" <PETERSON.Jenn@deq.state.or.us>		To
07/21/2008 02:13 PM	Eric Blischke/R10/USEPA/US@EPA	cc
	"ANDERSON Jim M" <ANDERSON.Jim@deq.state.or.us>	
	RE: Data Use Rules	Subject

I had the following comments on the data rules. Based on a call we had about a month ago, Burt was on point to answer some of the questions. However, I have not heard back, and they are not listed below.

#2: My issue was that if you always assume something is there in all media this can reek havoc on modeling efforts (esp. the food web model), that actually relies on accurate information what is present in different media to relate to tissue concentrations. Therefore, I think rules applied to the risk assessment versus modeling may / should be different. The question was to Burt to find out how this was being handled (e.g. do rules apply to the modeling efforts or just the risk assessment). I don't think the resolution presented answers that question.

#3 (on BERA Rules Memo): There is an ERA rule shown here that for all media listed (surface water, transition zone water, sediment, and tissue) an analyte is considered to be present if it is detected in at least once in any media (see bullets) within the study area. If the analyte is "present" then it feeds into #4 stating "if an analyte is not detected, but determined to be present (per #3) use 1/2 detection limit in the sum. My point was that determinations of presence of an analyte should be media specific instead of applying across all media in the study area. This would be consistent with the HH data rules. Otherwise we could be assuming a lot of things are present everywhere when they actually aren't. For example, just because it is detected in tissue that doesn't mean that it is in TZ water and needs to be assumed present at 1/2 detection limit. I also think these assumptions should be area specific (not harbor wide), otherwise we may have difficulties distinguishing risk between different areas of the harbor because we will always be assuming it is present at 1/2 detection limit (whether it is or not). I would recommend this is changed to be consistent with the HH health rules which apply to exposure areas and not across the whole site (see HH number 3B).

#4: I guess I can't dispute your resolution unless I go find the instances where it would make a difference. Since this is related to the LWG's use of spatial analysis, I guess we will have to wait until the Draft RI Report to comment.

-----Original Message-----
From: Blischke.Eric@epamail.epa.gov [mailto:Blischke.Eric@epamail.epa.gov]
Sent: Thursday, July 17, 2008 4:17 PM
To: Shephard.Burt@epamail.epa.gov; Humphrey.Chip@epamail.epa.gov; Davoli.Dana@epamail.epa.gov; GAINER Tom; Grepo-Grove.Gina@epamail.epa.gov; PETERSON Jenn L; jeremy_buck@fws.gov; ANDERSON Jim M; Goulet.Joe@epamail.epa.gov; Smith.Judy@epamail.epa.gov; Koch.Kristine@epamail.epa.gov; MCCLINCY Matt; POULSEN Mike; Fuentes.Rene@epamail.epa.gov; Robert.Neely@noaa.gov; Sheldrake.Sean@epamail.epa.gov; tomd@ctsi.nsn.us; csmith@parametrix.com; rgensemer@parametrix.com; rose@yakama.com; erin.madden@gmail.com; jay.field@noaa.gov; Cora.Lori@epamail.epa.gov; Ader.Mark@epamail.epa.gov; BBarquin@hk-law.com; audiehuber@ctuir.com; Lisa.Bluelake@grandronde.org; sheila@ridolfi.com; Benjamin Shorr; LavelleJM@cdm.com; Mary.Baker@noaa.gov; Michael.Karnosh@grandronde.org; FARRER David G; dallen@stratu
jpeers@stratusconsulting.com; (b) (6) Bob Dexter; cunninghame@gorge.net; JMalek@parametrix.com; nancy.munn@noaa.gov

Subject: Data Use Rules

The government technical team identified the five issues with the data use rules. Here is where we are on the five issues:

(1) There are 85 sediment samples being used in the HHRA and ERA that were collected by the City. The analyses done were not consistent with the LWG's methods in that a limited number of PCB congeners were analyzed for (we think mostly the WHO but we're not sure) and (b) benzo(k)fluoranthene and benzo(b)fluoranthene were not always analyzed as individual PAHs. Laura Kennedy thought that these samples were analyzed for Aroclors so total PCBs will be based on that. Mike Poulsen and I recommended an approach to the benzo issue in an e-mail to Laura earlier this week and she agreed to it.

Resolution: It is not possible to evaluate the congener data collected by the City of Portland offshore of its outfalls because it does not match up with the rest of the data set.

(2) It wasn't clear if the eco data rules apply to the FWM and BSAFs. Jennifer was concerned about the use of ND=0 versus ND=1/2 DL was used for the FWM/BSAFs and how it would impact the results.

Resolution: Non-detect values are being addressed in the FWM and BSAF development as follows: For chemicals that have not been detected, a concentration of zero will be utilized. For chemicals detected at least once, a concentration of 1/2 the DL will be used.

(3) It would be useful to have one narrative "Proposed Data Use rules and Data Interpretation for the BHHRA and BERA" rather than 2 separate ones. Each of them use slightly different language so it isn't clear if they are consistent for eco and hh when they need to be. Also, for the HHRA, EPCs calculated using sample numbers of 6 to 10 are to be discussed in the uncertainty section. It would be useful for the BERA to also include this.

Resolution: The LWG attempted to make the ERA and HHRA data rules as consistent as possible taking into account how the data will be evaluated in risk assessments.

(4) The issue of dealing with the duplicate samples that have the same coordinates hasn't been resolved for GIS mapping.

Resolution: Duplicates will be addressed as proposed in the data use rules; no changes will be made. Due to the limited number of duplicate samples and the availability of at least one sample at any location, this issue is highly unlikely to impact the overall data evaluation process.

(5) It's not clear if the OC normalization results for TOC (e.g., TOC<0.2% versus TOC >4>0%) have been discussed adequately within the TCT and resolved.

Resolution: We are agreeing to the OC normalization rules cited above.

Please let me know if you have any questions or concerns by COB Monday.
I am planning on getting back to the LWG on this topic by next Tuesday.

Thanks, Eric